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August 11, 2015

**VIA E-MAIL TRANSMISSION
AND ECF FILING**

The Honorable Robert E. Gerber
United States Bankruptcy Judge
United States Bankruptcy Court
Southern District of New York
Alexander Hamilton Custom House
One Bowling Green
New York, New York 10004

**Re: In re Motors Liquidation Company, et al.
Case No. 09-50026 (REG)**

Letter Regarding Update on Related Proceedings

Dear Judge Gerber:

King & Spalding LLP is co-counsel with Kirkland & Ellis LLP for General Motors LLC (“**New GM**”) in the above-referenced matter. We write to provide the Court, pursuant to Your Honor’s Endorsed Order dated May 5, 2015 [Dkt. No. 13131], with an update on developments in proceedings relating to New GM’s Motions to Enforce.

On Friday, August 7, 2015, New GM filed a Response (“**Response**”) to the *Motion to Withdraw the Reference Filed by Designated Counsel in Respect of the GUC Trust Asset Pleading*, in the United States District Court for the Southern District of New York (“**District Court**”), in the case captioned *Ignition Switch Plaintiffs and Certain Non-Ignition Switch Plaintiffs v. General Motors LLC* (Case 1:15-cv-05056-JMF). A copy of the Response is attached hereto as **Exhibit A**.

On the same date, the GUC Trust filed with the District Court the *Memorandum of Law by Wilmington Trust Company, as GUC Trust Administrator and Trustee, and the Participating Unitholders in Opposition to Motion to Withdraw the Reference with Respect to the Non-Ignition Switch Plaintiffs’ GUC Trust Asset Pleading* (“**GUC Trust Opposition**”). A copy of the GUC Trust Opposition is attached hereto as **Exhibit B**.

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Respectfully submitted,

/s/ Arthur Steinberg

Arthur Steinberg

AJS/sd
Encl.

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